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Before the
Federal Communications Commission
Washington, D.C. 20554

SEP 12 2011

FCC Mail Room

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Inter-carrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109

REPLY COMMENTS OF IOWA TELECOMMUNICATIONS ASSOCIATION

The Iowa Telecommunications Association¹ (ITA) submits these comments in reply to the comments filed in response to the Public Notice issued by the Federal Communications Commission ("Commission") on August 3, 2011 seeking comment relating to Universal Service and intercarrier compensation reform.²

¹ The Iowa Telecommunications Association (ITA) is the nation's largest state local exchange carrier association with more than 130 members. ITA represents all incumbent local exchange carriers ("ILECs") in Iowa except for Windstream and several small independent providers. ITA also represents three competitive local exchange carriers ("CLECs") and one Centralized Equal Access Provider.

² See *Further Inquiry into Certain Issues in the Universal Service-Inter-carrier Compensation Transformation Proceeding*, Public Notice, DA-11-1348 (August 3, 2011).

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The ITA has had the opportunity to review the comments filed in late August, and in reply to those comments, ITA supports the Universal Service Fund/Intercarrier Compensation/Connect America Fund reform proposal for rural rate-of-return incumbent local exchange carriers (RLECs) offered by the National Exchange National Telecommunications Cooperative Association (NTCA), the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), and the Western Telecommunications Alliance (WTA) (collectively, the Associations) to the Commission on April 18, 2011, and as modified on July 29, 2011 (the RLEC Plan).

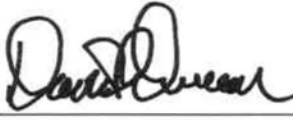
This Plan incorporates a balance of mechanisms intended to enable cost recovery for RLECs while enabling the deployment and maintenance of broadband and broadband-capable networks. These cost recovery mechanisms are aligned with the Commission's interest in constraining growth of high-cost support funds, and are designed to be implemented in complementary fashion with the America's Broadband Connectivity (ABC) Plan filed by large and mid-size carriers, also on July 29, 2011 (collectively, the Consensus Framework).

In this regard,. Adjustments to the Consensus Framework that affect those interests adversely could undermine the overall effectiveness of the Consensus Framework, thereby eliminating not only industry confidence in an acceptable reform solution, but also investor confidence that enables the injection of necessary private capital to support networks where no business case can be made.

The ITA's members serve the rural areas where no other provider ventures as the carrier of last resort. The RLEC Plan, as amended by the Consensus Framework, facilitates the ongoing nature of that role, and the ITA therefore urges the Commission to adopt and implement it without modification.

Respectfully submitted this 6th day of September, 2011.

IOWA TELECOMMUNICATIONS ASSOCIATION

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Associations' Comments was served this 6th day of September, 2011 by electronic filing and e-mail to the persons listed below.

By: /s/ Andrea Haney
Andrea Haney

The following parties were served:

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